



Document Processing Center (TS-790) Attn: Section 8(e) Coordinator Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 401 M Street, S.W. Washington, DC 20460

COMPANY SANITIZED

Dear Sir:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

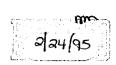
This letter transmits preliminary results of a one-generation mallard reproduction study at 0, 100, 300, 600 and 1000 ppm on Rohm and Haas Company exploratory pesticidal candidate ().

While birds in the 600 and 1000 ppm a.i. treatment groups exhibited no treatment related mortalities, overt signs of toxicity or effects on body weight, birds in the 1000 ppm a.i. treatment group showed a slight, statistically significant, treatment related increase in feed consumption during the study. In addition, while not statistically significant, both the 600 and 1000 ppm a.i. treatment groups exhibited increases in the numbers of hens with a regressing ovary at terminal necropsy.

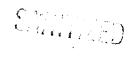
Both the 600 and 1000 ppm a.i. treatment groups showed statistically significant treatment related reductions in egg production. There was also a reduction in egg shell thickness at both the 600 and 1000 ppm a.i. test concentrations, although the difference was statistically significant only at the 1000 ppm a.i. test concentration. In the 1000 ppm a.i. treatment group there was also a slight, but statistically significant, reduction in the mean body weight of hatchlings. Based upon effects noted at the 600 ppm a.i. test concentration (628 ppm a.i. mean measured value), the no observed effect concentration for mallards exposed to () Technical in the diet during this study was 300 ppm a.i. (308 ppm a.i. mean measured value).

The final report will be submitted to EPA when it becomes available. () is the Rohm and Haas experimental designation for (). A diagram of the chemical structure is included in

Attachment I.



U.S. Environmental Protection Agency Office of Pollution Prevention and Toxics



December 19, 1994 Page Two

Rohm and Haas has produced only small quantities of these new substances for exploratory testing purposes. Only a very limited number of highly trained laboratory personnel have been involved in the synthesis and testing of the substances. Appropriate safety procedures have been employed to preclude any exposure to new pesticidal candidates whose toxicological properties have not been fully defined. These employees have been advised of the results of these studies.

Because of this very low potential for exposure within the Rohm and Haas Company and the very low probability that these substances are in commerce elsewhere, Rohm and Haas Company does not believe that this exploratory chemical poses any substantial risk to health or the environment.

Rohm and Haas Company considers the exact identity of these chemicals and their Rohm and Haas experimental designation number to be Confidential Business Information (CBI), and thus have enclosed with this letter a sanitized version for the public record with the confidential information deleted. We have also included, as Attachment II, substantiation supporting our CBI claims as required.

Rohm and Haas Company proposes the name "alkylaryl substituted nitrogen compound" as a generic, non-confidential, chemical name to describe the chemical substances discussed in this notice.

If you have any questions concerning this submittal, my telephone number is (215) 592-2986.

Sincerely,

George J. Powell

Senior Regulatory Specialist Product Integrity Department

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ATTACHMENT I



Generic name: alkylaryl substituted nitrogen compound



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

George J. Powell Senior Regulatory Specialist Product Integrity Department 1 Haas Company Independence Mall West Philadelphia, Pennsylvania 19105

OFFICE OF PREVENTION, PESTICIDES AND **TOXIC SUBSTANCES**

APR 1 8 1995

EA acknowledges the receipt of information simitted by your organization under Section (e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests" .

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

> Document Processing Center (7407) Attn: TSCA Section 8(e) Coordinator Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

13294A Enclosure

Terry R. O'Bryan Risk Analysis Branch

Recycled/Recyclable Printed with Soy/Canola ink on paper that contains at least 50% recycled fiber

Triage of 8(e) Submissions

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